

involved were as follows:

HEROIN

- i. defendants **HUGO CABELLO** and **EVERARDO CABELLO** conspired to possess with intent to distribute one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Scheduled I controlled substance;

COCAINE

- ii. defendants **HUGO CABELLO, EVERARDO CABELLO, GREGORY WILTZ, JARAY JERONE LILLY, RIGOBERTO SILVA, JR., CARLOS GONZALEZ-LOPEZ, DANIEL MIRELES** and **VIRGINIA LUVIANO** conspired to possess with intent to distribute five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance;

COCAINE

- iii. defendants **CRYSTAL CRUZ** and **SIMON MUÑOZ** conspired to possess with intent to distribute five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(A), and 841(b)(1)(B).

COUNT TWO
(Conspiracy to Launder Monetary Instrument)

From on or about May 2015 and continuing thereafter until the date of this indictment, in the Southern District of Texas, and elsewhere, and within the jurisdiction of the Court, **Defendants**,

**HUGO CABELLO
EVERARDO CABELLO
CRYSTAL CRUZ
and
DANIEL DIAZ.**

did knowingly and intentionally conspire and agree with each other and others known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, § 1956, to-wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of a specified unlawful activity, that is, possession with intent to distribute and conspiracy to possess with intent to distribute controlled substances in violation of Title 21, United States Code, §§ 841(a)(1) and 846, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting or attempting to conduct such financial transactions knew that the property involved in the financial transactions, represented the proceeds of some form of unlawful activity.

In violation of Title 18, United States Code, Sections 1956(h) and 1956(a)(1)(B)(i).

**COUNT THREE
(Possession With Intent to Distribute Controlled Substance)**

On or about May 18, 2024, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants**,

**HUGO CABELLO
EVERARDO CABELLO
and
RIGOBERTO SILVA, JR.,**

did knowingly and intentionally aid, abet, and assist each other and others known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance. This violation involved a quantity of five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii), and Title 18, United States Code, Section 2.

COUNT FOUR
(Laundering Monetary Instruments)

On or about May 23, 2024, in the Southern District of Texas and within the jurisdiction of the Court, **defendant**,

**HUGO CABELLO
EVERARDO CABELLO
and
DANIEL DIAZ,**

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to-wit, the transfer, delivery and other disposition of one or more monetary instruments, which involved the proceeds of a specified unlawful activity, that being, possession with intent to distribute and conspiracy to possess with intent to distribute controlled substances in violation of Title 21, United States Code, §§ 841(a)(1) and 846, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting or attempting to conduct this financial transaction knew that the property involved in the financial transaction, that is, approximately \$223,900 in United States currency, represented the proceeds of some form of unlawful activity.

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), and Title 18, United States Code, Section 2.

COUNT FIVE
(Possession With Intent to Distribute Controlled Substance)

On or about May 28, 2024, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants**,

HUGO CABELLO

**and
EVERARDO CABELLO,**

did knowingly and intentionally aid, abet, and assist each other and others known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance. This violation involved a quantity of five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii), and Title 18, United States Code, Section 2.

**COUNT SIX
(Possession With Intent to Distribute Controlled Substance)**

On or about May 28, 2024, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants**,

**HUGO CABELLO
and
EVERARDO CABELLO,**

did knowingly and intentionally aid, abet, and assist each other and others known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance. This violation involved a quantity of one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i), and Title 18, United States Code, Section 2.

**COUNT SEVEN
(Possession With Intent to Distribute Controlled Substance)**

On or about August 11, 2024, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants**,

**HUGO CABELLO
and**

VIRGINIA LUVIANO,

did knowingly and intentionally aid, abet, and assist each other and others known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance. This violation involved a quantity of five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii), and Title 18, United States Code, Section 2.

COUNT EIGHT
(Possession of Unregistered Firearm)

On or about August 4, 2024, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

GREGORY WILTZ,

did knowingly possess a firearm, namely a destructive device as defined by Title 18, United States Code Section 921(a)(4)(B), a Street Sweeper Model SWD 12 gauge shotgun, which had not been registered to the defendant in the National Firearms Registration and Transfer Record.

In violation of Title 26, United States Code, Sections 5861(d), 5845(a), and 5871.

COUNT NINE
(Felon in Possession of a Firearm)

On or about August 4, 2023, in the Southern District of Texas and within the jurisdiction of the Court, **Defendant**,

GREGORY WILTZ,

knowing that he had been convicted in the 185th District Court of Harris County, Texas, on March 19, 2009, for Possession of Marijuana of over 4 ounces, but less than 5 pounds, Case Number 1131060, a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate and foreign commerce a firearm, namely, a Masterpiece Arms pistol, Model

MPA930, 9mm in caliber.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

NOTICE OF FORFEITURE I

The allegations contained in Counts 1, 3, and 5-7 of this Indictment are re-alleged. Pursuant to Title 21, United States Code, Section 853(a) and Title 18, United States Code, Section 982(a)(1), the United States of America gives notice to **Defendants**,

**HUGO CABELLO
EVERARDO CABELLO
CRYSTAL CRUZ
GREGORY WILTZ
JARAY JERONE LILLY
RIGOBERTO SILVA, JR.
DANIEL DIAZ
CARLOS GONZALEZ-LOPEZ
DANIEL MIRELES
VIRGINIA LUVIANO
and
SIMON MUÑOZ,**

that upon conviction of an offense in violation of Title 21, United States Code, Sections 841 or 846, the property subject to forfeiture includes, but is not limited to, the following:

1. The real property, including all improvements and appurtenances, located at 8534 Alsuma Street, Houston, Texas 77029 and legally described as:

BEING Lot one hundred twenty-four (124), in block six (6), of Groveland Terrace, an addition in Harris County, Texas, according to the map or plat thereof recorded in volume 20, page 35 of the Map Records of Harris County, Texas.

2. The real property, including all improvements and appurtenances, located at 7034 Avenue Q, Houston, Texas 77011 and legally described as:

BEING Lots 40 and 41, in block P, of Magnolia Park, Section 2, a subdivision in Harris County, Texas, according to the map or plat thereof recorded in volume 4, page 69 of the Map Records of Harris County, Texas.

3. The real property, including all improvements and appurtenances, located at 8506 Alsuma Street, Houston, Texas 77029 recorded under Harris County Clerk's File No. 2020419770

and legally described as:

BEING Lot One Hundred Seventeen (117), in Block Six (6), of GROVELAND TERRACE, a subdivision in Harris County, Texas, according to the Map or Plat thereof, recorded in Volume 20, Page 35 of the Map Records of Harris County, Texas.

Tract 2: Lot 118, in Block 6, of GROVELAND TERRACE, a subdivision in Harris County, Texas, according to the Map or Plat thereof, recorded in Volume 20, Page 35 of the Map Records of Harris County, Texas.

4. The real property, including all improvements and appurtenances, located at 7210 Avenue N, Houston, Texas 77011 and legally described as:

BEING Lot 30, Block 119, Magnolia Park Subdivision, in the City of Houston, Harris County, Texas, according to the map or plat thereof recorded in volume 4, pages 69-73 map records of Harris County, Texas. Account NO. 0251970000030 also known as 7210 Avenue N, Houston, TX 77011.

5. \$223,000 in United States currency.
6. \$13,434 in United States currency.
7. \$5449 in United States currency.

NOTICE OF FORFEITURE II

The allegations contained in Counts 2 and 4 of this Indictment are re-alleged. Pursuant to Title 18, United States Code, Section 982(a)(1), the United States of America gives notice to **Defendants**,

**HUGO CABELLO
EVERARDO CABELLO
RIGOBERTO SILVA, JR
and
DANIEL DIAZ,**

that upon conviction of an offense in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) or 1956(h), the property subject to forfeiture includes, but is not limited to, the following:

\$223,900 in United States currency.

NOTICE OF FORFEITURE III

The allegations contained in Count 8 of this Indictment are re-alleged. Pursuant to Title 18,

United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the United States gives notice to **Defendant**,

GREGORY WILTZ,

that upon conviction of a violation of Title 18, United States Code, Sections 922(g) or 924(a)(8), all firearms and ammunition involved in said violation are subject to forfeiture, including but not limited to the following:

1. Masterpiece Arms pistol, Model MPA930, 9mm in caliber, SN# B11769;
2. Chengdu Electric Motor Factory rifle, Model Type 56, 7.62 in caliber, SN# 1618946;
3. Black Aces Tactical shotgun, Model Pro Bullup FD-12, 12-gauge in caliber, SN# 20BAT17950;
4. SWD shotgun, Model Street Sweeper, 12-gauge in caliber, SN# 13058; and
5. 21 Federal rounds of 9mm ammunition.

NOTICE OF FORFEITURE IV

The allegations contained in Count 9 of this Indictment are re-alleged. Pursuant to Title 26, United States Code, Section 5872 and Title 28, United States Code, Section 2461(c), the United States gives notice to **Defendant**,

GREGORY WILTZ,

that upon conviction of a violation of Title 26, United States Code, Section 5861(d), all firearms and ammunition involved in said violation are subject to forfeiture, including but not limited to the following:

One destructive device as defined in Title 18, United States Code Section 921(a)(4)(B), that is a SWD shotgun, Model Street Sweeper, 12-gauge in caliber, SN# 13058.

MONEY JUDGMENT

Defendants are notified that upon conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture, for which the **Defendants** may be jointly and

severally liable.

SUBSTITUTE ASSETS

Pursuant to Title 21, United States Code, Section 853(p), incorporated by reference in Title 28, United States Code, Section 2461(c), **Defendants** are notified that if property subject to forfeiture, as a result of any act or omission of **Defendants**,

- (A) cannot be located upon the exercise of due diligence;
- (B) has been transferred or sold to, or deposited with, a third party;
- (C) has been placed beyond the jurisdiction of the court;
- (D) has been substantially diminished in value; or
- (E) has been commingled with other property that cannot be divided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of the **Defendants** up to the total value of such property.

A TRUE BILL:

Original Signature on File

FOREPERSON OF THE GRAND JURY

NICHOLAS J. GANJEI
UNITED STATES ATTORNEY

Leo J. Leo III
LEO J. LEO, III
Assistant United States Attorney